

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN D

UNITED STATES OF AMERICA,
v.

Case: 2:25-cr-20136
Assigned To : Leitman, Matthew F.
Referral Judge: Altman, Kimberly G.
Assign. Date : 3/6/2025
Description: IND SEALED MATTER (SS)

D-1 LESTER KNUCKLES,
D-2 JOHNATHAN KNUCKLES,
D-3 TASHIA FREEMAN,

Violation(s):
18 U.S.C. § 371
18 U.S.C. § 922(a)(1)(A)
18 U.S.C. § 922(g)(1)

Defendants.

INDICTMENT

The Grand Jury charges:

COUNT ONE

18 U.S.C. §§ 371 and 922(a)(1)(A)

Conspiracy to Engage in the Business of Dealing in Firearms Without a License

From on or about October 28, 2024, through on or about December 10, 2024, in the Eastern District of Michigan, defendants LESTER KNUCKLES, JOHNATHAN KNUCKLES, and TASHIA FREEMAN, knowingly and willfully conspired and agreed together and with each other, and others, known and unknown to the Grand Jury, to commit an offense against the United States, specifically to engage in the business of dealing in firearms without a license, in violation of Title 18, United States Code, Section 922(a)(1)(A).

OBJECT OF THE CONSPIRACY

The object of the conspiracy was for the defendants to make a profit by obtaining firearms and then selling them in the Detroit, Michigan area without first obtaining a federal firearms license authorizing them to sell firearms.

OVERT ACTS

In furtherance of the conspiracy and to achieve the object of the conspiracy, members of the conspiracy committed the following overt acts, among others, in the Eastern District of Michigan and elsewhere:

1. On or about October 28, 2024, LESTER KNUCKLES contacted an Undercover Law Enforcement Agent (UCA) by telephone to discuss multiple firearms that he had for sale. LESTER KNUCKLES agreed to sell the UCA multiple firearms.
2. On or about October 29, 2024, LESTER KNUCKLES and the UCA agreed by telephone to meet at a location in Detroit, MI for the UCA to purchase three firearms.
3. On or about October 29, 2024, JOHNATHAN KNUCKLES met the UCA on behalf of LESTER KNUCKLES to complete the deal.
4. On or about that date, the UCA purchased two AR-style pistols, and one AK-style pistol from JONATHAN KNUCKLES for \$2,600. This included a CZ, model Scorpion Evo 3, 9mm caliber pistol.

5. During the week of November 11, 2024, LESTER KNUCKLES and the UCA had telephone contact to discuss multiple firearms KNUCKLES had for sale. LESTER KNUCKLES and the UCA agreed by telephone to meet at a location in Detroit, MI for the UCA to purchase four additional firearms.

6. On or about November 13, 2024, TASHIA FREEMAN met the UCA on behalf of LESTER KNUCKLES to complete the deal.

7. On or about that date, the UCA purchased two AR-style pistols, one AR-style rifle, and one AK-style pistol from FREEMAN for \$3,600. This included a Century Arms International, model VSKA 7.62x39mm caliber pistol.

8. On or about December 2, 2024, LESTER KNUCKLES and the UCA had telephone contact to discuss multiple firearms KNUCKLES had for sale. LESTER KNUCKLES and the UCA agreed by telephone to meet at a location in Detroit, MI for the UCA to purchase three additional firearms.

9. On or about December 2, 2024, JOHNATHAN KNUCKLES met the UCA on behalf of LESTER KNUCKLES to complete the deal.

10. On or about that date, the UCA and JOHNATHAN KNUCKLES discussed the sale of a bag containing various magazines and ammunition, which the UCA agreed to pay an additional \$250 for the items.

11. The UCA then purchased two pistols, one AR-style pistol, and the additional bag of magazines and ammunition from JOHNATHAN KNUCKLES for \$2,650.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

18 U.S.C. § 922(a)(1)(A)

Engaging in the Business of Dealing in Firearms Without a License

From on or about October 28, 2024, through on or about December 10, 3.2024, in the Eastern District of Michigan, Southern Division, the defendant, LESTER KNUCKLES, not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, willfully engaged in the business of dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

COUNT THREE

18 U.S.C. § 922(g)(1)

Felon in Possession of a Firearm

On or about October 29, 2024, in the Eastern District of Michigan, Southern Division, the defendant, JOHNATHAN KNUCKLES, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, in and affecting interstate commerce, a firearm, that is, one CZ, model Scorpion Evo 3, 9mm caliber pistol, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT FOUR
18 U.S.C. § 922(g)(1)
Felon in Possession of a Firearm

On or about November 13, 2024, in the Eastern District of Michigan, Southern Division, the defendant, TASHIA FREEMAN, knowing that she had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, in and affecting interstate commerce, a firearm, that is, one Century Arms International, model VSKA 7.62x39mm caliber pistol, in violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION
18 U.S.C. § 924(d), 18 U.S.C. § 981 and 28 U.S.C. § 2461
Criminal Forfeiture

The allegations contained in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18 United States Code Sections 981 and 924(d) and Title 28, United States Code, Section 2461.

Upon conviction of the offenses charged in Counts One through Four of this Indictment, the defendants shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28 United States Code, Section 2461(c), any firearm or ammunition involved in or used in any knowing violation of said offenses.

Upon conviction of the offense charged in Count One of this Indictment, the defendants shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any property which constitutes or is derived from proceeds traceable to the offense.

THIS IS A TRUE BILL.

s/ *Grand Jury Foreperson*
Grand Jury Foreperson

JULIE A. BECK
Acting United States Attorney

s/ *Sara D. Woodward*
SARA D. WOODWARD
Chief, General Crimes Unit
Assistant United States Attorney

s/ *Sean L. King*
SEAN L. KING
Assistant United States Attorney

Dated: March 6, 2025

Case: 2:25-cr-20136
 Assigned To : Leitman, Matthew F.
 Referral Judge: Altman, Kimberly G.
 Assign. Date : 3/6/2025
 Description: IND SEALED MATTER (SS)

United States District Court
 Eastern District of Michigan

Criminal Case Co

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information		Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :		Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		AUSA's Initials: <i>SLK</i>

Case Title: USA v. D-1 Lester Knuckles, et al.

County where offense occurred : Wayne

Check One: Felony Misdemeanor Petty

Indictment/____ Information -- no prior complaint.
 Indictment/____ Information -- based upon prior complaint [Case number: ____]
 Indictment/____ Information -- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ Judge: _____

Corrects errors; no additional charges or defendants.
 Involves, for plea purposes, different charges or adds counts.
 Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
-----------------------	----------------	--

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

March 6, 2025

Date



Sean L. King
 Assistant United States Attorney
 211 W. Fort Street, Suite 2001
 Detroit, MI 48226-3277
 Phone: 313-226-9727
 Fax: 313-226-2372
 E-Mail address: Sean.King@usdoj.gov
 Attorney Bar #: TX24097939

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.